

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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CIVIL ACTION NO. 04-10600-PBS

U.S. DISTRICT COURT
DISTRICT OF MASS

RHODA PACKER, AS EXECUTRIX OF)
THE ESTATE OF ARCHIE PACKER,)
Plaintiff,)
)
v.)
)
REGISTER & GRILLE)
MANUFACTURING CO., INC.,)
Defendant.)
)

**JOINT STATEMENT
PURSUANT TO
LOCAL RULE 16.1(D)**

The parties hereby submit their Joint Statement pursuant to Local Rule 16.1(D) and the Court's Notice of Scheduling Conference.

I. Proposed Pretrial Schedule and Discovery Plan

February 1, 2005	Deadline for completion of all fact discovery, including requests for production of documents, interrogatories, and fact witness depositions.
March 1, 2005	Deadline for serving initial disclosures regarding experts pursuant to Fed. R. Civ. P. 26(a)(2), if either party determines that the use of an expert witness is appropriate.
April 1, 2005	Deadline for serving disclosures regarding experts in response to initial expert disclosures (e.g. disclosures regarding competing or rebuttal experts, if only one party serves initial expert disclosures on any issues, or any disclosure pursuant to Fed. R. Civ. P. 26(a)(2)(C)).

April 1, 2005	Deadline for serving and filing dispositive motions, if either party determines that such a motion is appropriate.
May 2, 2005	Deadline for serving and filing opposition to any dispositive motions filed.
June 1, 2005, or 30 days after the Court's decision on dispositive motions, whichever is later	Deadline for taking expert witness depositions.

II. Settlement

Defendant has received a written settlement demand from Plaintiff's counsel in accordance with Local Rule 16.1(C).

III. Certifications

The parties shall submit separately any certifications required by Local Rule 16.1(D)(3).

WHEREFORE, the parties respectfully request that the Court approve their Proposed Pretrial Schedule and Discovery Plan, with such amendments as the Courts deems just and proper.

Respectfully submitted,

The Plaintiff, Rhoda Packer, as
Executrix of the Estate of Archie Packer,
By her Attorneys,

The Defendant,
Register & Grille Manufacturing Co., Inc.
By its Attorney,



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CERTIFICATE OF SERVICE

I, Louis Movitz, Plaintiff's counsel, hereby certify that I served a true copy of the above document upon Defendant's counsel by first class mail on the 24th day of June, 2004.



Louis Movitz